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January 8, 2024

Via ECF and Email

The Honorable Coleen McMahon  
United States District Court Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *United States v. Sabitri Laforest, Garry Laforest, et al*  
21 cr 272

Dear Judge McMahon:

I represent Sabitri Laforest in the above-referenced matter. Thomas Dunn, Esq. represents Garry Laforest. We jointly move this Court for an order of exoneration of their pretrial recognizant bond. A proposed form of Order is enclosed. Assistant United States Attorney Matthew Shahabian has reviewed the proposed order and does not object to the entry of the order.

On May 17, 2022, the defendants, Ms. Laforest and Mr. Laforest, their first appearance in this district, were each released on a pretrial recognizant bond of one million dollars cosigned by three suretors and secured by their jointly owned property at 22-114 101<sup>st</sup> Avenue, Queens Village, New York<sup>1</sup>. On July 13, 2023, Your Honor sentenced Ms. Laforest to a term of seventy-eight months and Mr. Laforest to a term of 55 months. Both are currently incarcerated serving their respective sentences.

Respectfully submitted,

/s/

Donna R. Newman

Cc: AUSA Matthew Shahabian

Thomas Dunn, Esq.

Sabitri Laforest via email

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<sup>1</sup> The Laforest's twenty-year old son Johathan Laforest, Mr. Laforest's daughter and Ms. Laforest step-daughter Holly Laforest, along with Mr. Laforest mother reside at the Queens Village residence.

